

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

In re Application of:	§	Filed: January 8, 2004
Richard D. Dettinger et al.	§	
	§	Group Art Unit: 2166
Serial No.: 10/753,520	§	
	§	Examiner: Khanh B. Pham
Confirmation No.: 9843	§	

For: METHOD OF GENERATING DATABASE TRANSACTION STATEMENTS  
BASED ON EXISTING QUERIES

MAIL STOP APPEAL BRIEF - PATENTS  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

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June 25, 2007	/David M. Magness/
Date	David M. Magness

Dear Sir:

**APPEAL BRIEF**

Applicants submit this Appeal Brief to the Board of Patent Appeals and Interferences on appeal from the decision of the Examiner of Group Art Unit 2166 dated January 25, 2007, finally rejecting claims 1-15 and 17-22. The final rejection of claims 1-15 and 17-22 is appealed. This Appeal Brief is believed to be timely since it is electronically transmitted by the due date of June 25, 2007, as set by the filing of a Notice of Appeal on April 25, 2007.

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### **Real Party in Interest**

The present application has been assigned to International Business Machines Corporation, Armonk, New York.

### **Related Appeals and Interferences**

Applicant asserts that no other appeals or interferences are known to the Applicant, the Applicant's legal representative, or assignee which will directly affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.

### **Status of Claims**

Claims 1-15 and 17-22 are pending in the application. Claims 1-22 were originally presented in the application. Claim 16 has been canceled without prejudice. Claims 1-15 and 17-22 stand finally rejected as discussed below. The final rejections of claims 1-15 and 17-22 are appealed. The pending claims are shown in the attached Claims Appendix.

### **Status of Amendments**

All claim amendments have been entered by the Examiner. No amendments to the claims were proposed after the final rejection.

## **Summary of Claimed Subject Matter**

### **A. CLAIM 1 - INDEPENDENT**

One embodiment of the invention (see, e.g., Claim 1) provides a computer-implemented method for generating a transactional database statement based on an existing database statement. See, e.g., Page 13, Paragraph 0049; Figure 3A, Item 300. The method includes parsing the existing database statement to identify fields and corresponding field attributes. See, e.g., Pages 13-14, Paragraphs 0049-0050; Figure 3A, Items 302, 304. The method also includes utilizing one or more interfaces for receiving input regarding the transactional database statement. See, e.g., Page 14, Paragraph 0051; Figure 3A, Item 306. The method further includes generating the transactional database statement based on the identified fields and user input. See, e.g., Page 14, Paragraph 0051; Figure 3A, Item 308.

### **B. CLAIM 10 - INDEPENDENT**

One embodiment of the invention (see, e.g., Claim 10) provides a computer-readable storage medium containing a program for generating a transactional database statement based on an existing database statement. See, e.g., Page 9, Paragraph 0037; Page 10, Paragraph 0039; Figure 1, Items 132, 140; Page 13, Paragraph 0049; Figure 3A, Item 300. The program, when executed by a processor, performs operations including parsing the existing database statement to identify fields and corresponding field attributes. See, e.g., Pages 13-14, Paragraphs 0049-0050; Figure 3A, Items 302, 304. The operations also include generating one or more interfaces for receiving input regarding the transactional database statement. See, e.g., Page 14, Paragraph 0051; Figure 3A, Item 306. The operations further include generating the transactional database statement based on the identified fields and user input. See, e.g., Page 14, Paragraph 0051; Figure 3A, Item 308.

C. CLAIM 15 - INDEPENDENT

One embodiment of the invention (see, e.g., Claim 15) provides a data processing system. See, e.g., Page 8, Paragraph 0030; Figure 1, Item 100. The data processing system includes a processor, a database, and an existing query statement residing in storage. See, e.g., Page 9, Paragraph 0037; Page 10, Paragraph 0040; Figure 1, Items 132, 154. The system also includes a query interface allowing users to issue query statements against the database and a transaction manager. See, e.g., Page 10, Paragraph 0041; Figure 1, item 142. The transaction manager, when executed by the processor, is configured to generate a transactional statement against the database based on fields and corresponding field attributes of the existing query statement. See, e.g., Page 12, Paragraph 0044; Figure 1, Item 144; Pages 13-14, Paragraphs 0049-0050; Figure 3A, Item 304. The transaction manager is configured to generate the transactional statement against the database by parsing the existing query statement to identify the fields and corresponding field attributes. See, e.g., Pages 13-14, Paragraphs 0049-0050; Figure 3A, Items 302, 304. The transaction manager is also configured to generate the transactional statement against the database by generating one or more interfaces for receiving input regarding the transactional statement. See, e.g., Page 14, Paragraph 0051; Figure 3A, Item 306. The transaction manager is further configured to generate the transactional statement against the database by generating the transactional statement based on the identified fields and user input. See, e.g., Page 14, Paragraph 0051; Figure 3A, Item 308.



### **Grounds of Rejection to be Reviewed on Appeal**

1. Rejection of claims 1-15 and 17-22 under 35 U.S.C. § 102(e) as being anticipated by *Davison* (U.S. Pub. No. 2003/0037069).

## **ARGUMENTS**

### **1. Rejection of claims 1-15 and 17-22 under 35 U.S.C. § 102(e) as being anticipated by *Davison*.**

#### *The Applicable Law*

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

#### *The Cited Reference*

In rejecting the pending claims, the Examiner cites to *Davison*. *Davison* describes a method and system for providing a framework for processing markup language documents. See *Davison*, Title. In *Davison*, a request is received containing information that identifies data to be retrieved. See *Davison*, Pg. 4, Paragraph 0064. The request comprises information that identifies a pre-generated database query stored on a server. See *Davison*, Pg. 4, Paragraph 0065. The request comprises a uniform resource locator (URL) which includes information that points to a file or directory containing the pre-generated query. See *Davison*, Pg. 4, Paragraphs 0065-0067. The URL may be parsed to extract a query identifier and the query is located by parsing a library file to locate the particular query specified in the request. See *Davison*, Pg. 4, Paragraphs 0070-0071. The query is then used to query a database. See *Davison*, Pg. 4, Paragraph 0071.

### *The Examiner's Rejection*

The pending claims describe “parsing [an] existing database statement to identify fields and corresponding field attributes” and “generating [a] transactional database statement based on the identified fields and user input”. The Examiner states that *Davison* describes “parsing [an] existing database statement to identify fields and corresponding field attributes” at Paragraph 0069 and “generating [a] transactional database statement based on the identified fields and user input” at Paragraphs 0068-0070. In response to Applicants’ previous arguments that *Davison* does not teach the claimed subject matter, the Examiner states that the cited sections clearly teach “parsing a library of related queries” to generate a particular query using a query name and query location included in the user’s request. *See Final Office Action dated 1-25-07, Page 10.* In response to the Examiner’s arguments, Applicants respectfully maintain that *Davison* does not teach the claimed subject matter as described in the previous *Response to Office Action*, and further provide the following arguments.

### *Applicants’ Response*

First, with respect to “parsing [an] existing database statement to identify fields and corresponding field attributes”, the Examiner maintains that *Davison* describes parsing a library of related queries at Paragraphs 0068-0070. However, as stated in *Davison* at Paragraph 0070, a library file is parsed to locate a particular query specified in a request. Thus, *Davison* teaches parsing a library file, and not a query. *See Davison, Pg. 4, Paragraph 0070.* Accordingly, Applicants submit that *Davison* does not teach “parsing [an] existing database statement to identify fields and corresponding field attributes”. Therefore, withdrawal of the rejection is respectfully requested.

With respect to “generating [a] transactional database statement based on the identified fields and user input”, the Examiner cites Paragraphs 0068-0070. The cited section describes obtaining a query name “queryname” and a particular location of a pre-generated query on a server. *See Davison* at Pg. 4, Paragraph 0068. The cited section also describes how an administrator pre-generates a set of database queries by writing the queries or using a query design tool. *See Davison* at Pg. 4, Paragraph 0069.

Applicants submit that the cited section does not describe “generating [a] transactional database statement based on the identified fields and user input” for multiple reasons. First, the cited section states that the query name and location are obtained from a URL, and not from a query as suggested by the Examiner. See *Davison*, Pg. 4, Paragraph 0068. Second, the query name and location obtained from the URL describe a file name and location of a file in which a pre-generated query is stored, and do not refer to fields of the pre-generated query as suggested by the Examiner. See *Davison*, Pg. 4, Paragraph 0067-0068. The query name and location are used to locate a pre-generated query. Furthermore, as indicated by the adjective “pre-generated”, the located query is generated before the URL identifying the pre-generated query is received. See *Davison*, Pg. 4, Paragraphs 0065-0069. As described above, after being located, the pre-generated query is used to access the database without modification of the pre-generated query. See *Davison*, Pg. 4, Paragraphs 0065-0072. Thus, the information identified by the Examiner (the query name and location) are merely used to locate a pre-generated query, and are not used to generate a query as suggested by the Examiner. See *id.*

Accordingly, Applicants respectfully submit that *Davison* does not teach “parsing [an] existing database statement to identify fields and corresponding field attributes” and “generating [a] transactional database statement based on the identified fields and user input” as described in the pending claims. Therefore, the claims are believed to be allowable, and withdrawal of the rejection is respectfully requested.

## CONCLUSION

The Examiner errs in finding that claims 1-15 and 17-22 are anticipated by *Davison* under 35 U.S.C. § 102(e). Accordingly, withdrawal of the rejections and allowance of all claims is respectfully requested.

Respectfully submitted, and  
**S-signed pursuant to 37 CFR 1.4,**

/Gero G. McClellan, Reg. No. 44,227/

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Gero G. McClellan  
Registration No. 44,227  
Patterson & Sheridan, L.L.P.  
3040 Post Oak Blvd. Suite 1500  
Houston, TX 77056  
Telephone: (713) 623-4844  
Facsimile: (713) 623-4846  
Attorney for Appellant(s)

## CLAIMS APPENDIX

1. (Previously Presented) A computer-implemented method for generating a transactional database statement based on an existing database statement, comprising:
  - parsing the existing database statement to identify fields and corresponding field attributes;
  - utilizing one or more interfaces for receiving input regarding the transactional database statement; and
  - generating the transactional database statement based on the identified fields and user input.
2. (Original) The method of claim 1, wherein the transactional database statement is one of: an insert statement, an update statement, and a delete statement.
3. (Previously Presented) The method of claim 2, wherein generating the transactional database statement based on the identified fields and user input comprises:
  - generating a transactional database statement with one or more of the identified fields; and
  - populating one or more of the fields with input received via the one or more interfaces.
4. (Original) The method of claim 1, further comprising attaining metadata regarding one or more of the identified fields.
5. (Previously Presented) The method of claim 1, wherein utilizing the one or more interfaces comprises:
  - generating at least one graphical user interface for receiving input from a user, wherein the graphical user interface allows the user to specify one or more records to affect with the transactional database statement.
6. (Original) The method of claim 5, wherein utilizing the one or more interfaces further comprises:

issuing a query to retrieve data related to at least one record specified by the user via the graphical user interface; and  
displaying the data retrieved in the graphical user interface.

7. (Previously Presented) The method of claim 6, wherein:  
the transactional database statement is an update statement;  
the graphical user interface allows the user to make changes to at least a portion of the retrieved data; and  
submit the changes to the database via the transactional database statement.

8. (Original) The method of claim 7, wherein:  
the graphical user interface allows the make changes data related to more than one record; and  
submit the changes to the database via the transactional database statement.

9. (Original) The method of claim 5, further comprising providing the user access to the graphical user interface screen via a plug-in component to an application.

10. (Previously Presented) A computer-readable storage medium containing a program for generating a transactional database statement based on an existing database statement which, when executed by a processor, performs operations comprising:  
parsing the existing database statement to identify fields and corresponding field attributes;  
generating one or more interfaces for receiving input regarding the transactional database statement; and  
generating the transactional database statement based on the identified fields and user input.

11. (Original) The computer-readable medium of claim 10, wherein the transactional database statement is one of: an insert statement, an update statement, and a delete statement.

12. (Previously Presented) The computer-readable medium of claim 10, wherein generating the transactional database statement based on the identified fields and user input comprises:

generating a transactional database statement with one or more of the identified fields; and

populating one or more of the fields with input received via the one or more interfaces.

13. (Previously Presented) The computer-readable medium of claim 10, wherein generating the one or more interfaces comprises:

generating at least one graphical user interface for receiving input from a user, wherein the graphical user interface allows the user to specify one or more records to affect with the transactional database statement.

14. (Original) The computer-readable medium of claim 13, wherein generating the one or more interfaces further comprises:

issuing a query to retrieve data related to at least one record specified by the user via the graphical user interface; and

displaying the data retrieved in the graphical user interface.

15. (Previously Presented) A data processing system comprising:

a processor;

a database;

an existing query statement residing in storage;

a query interface allowing users to issue query statements against the database;

and

a transaction manager which, when executed by the processor, is configured to generate a transactional statement against the database based on fields and corresponding field attributes of the existing query statement; wherein the transaction manager is configured to generate the transactional statement against the database by:

parsing the existing query statement to identify the fields and

corresponding field attributes;



generating one or more interfaces for receiving input regarding the transactional statement; and

generating the transactional statement based on the identified fields and user input.

16. (Canceled)

17. (Original) The data processing system of claim 15, wherein the transaction manager is configured to attain, from the database, metadata for use in generating the transactional statement.

18. (Original) The data processing system of claim 15, further comprising one or more plug-in components allowing access to the one or more interfaces from the query interface.

19. (Original) The data processing system of claim 18, wherein the one or more plug-in components provide access to an interface for entering input to be used in an insert transactional statement.

20. (Original) The data processing system of claim 18, wherein the one or more plug-in components provide access to an interface for updating a record.

21. (Original) The data processing system of claim 20, wherein the one or more plug-in components provide access to an interface for updating multiple records.

22. (Original) The data processing system of claim 20, wherein the database is one of: a relational database, an object-relational database, an XML database, and a relational database.

## EVIDENCE APPENDIX

None.

## RELATED PROCEEDINGS APPENDIX

None.